

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**


GILBERT GOMEZ VICENTE, et al.,


Plaintiffs,


VS.


UNITED STATES OF AMERICA,
ROMUALDO BARRERA, Agent, United
States Border Patrol, in his individual capacity;
and DOES 1-20, Agents, United States Border
Patrol, in their individual capacities,


Defendants.













CIVIL ACTION NO. 5:20-cv-00081

JOINT MOTION FOR ENTRY OF PROTECTIVE ORDER

Plaintiffs and Defendant, the United States of America, pursuant to Federal Rule of Civil Procedure 26(c) and the Privacy Act of 1974, 5 U.S.C. § 552a(b)(11), jointly request that the Court enter the Protective Order filed with this motion. The parties have agreed to the entry of the Protective Order so that information may be disclosed without invading the privacy of witnesses and other persons involved in the matter at issue in this case.

Dated: August 17, 2021

Respectfully Submitted,

s/Jimmy A. Rodriguez
 Jimmy A. Rodriguez
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 Southern District of Texas
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Attorneys for Plaintiff

CERTIFICATE OF CONFERENCE

I, Jimmy A. Rodriguez, do hereby certify that on August 16, 2021, I conferred with Plaintiffs' counsel regarding this motion, who agreed to move jointly for the relief requested. I also conferred with counsel for the Defendant, Romualdo Barrera, in his individual capacity, who does not oppose this motion.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney

CERTIFICATE OF SERVICE

I certify that on August 17, 2021, a true and correct copy of the foregoing was filed with the United States District Clerk for the Southern District of Texas and electronically served on all counsel of record via the District's ECF system.

s/ Jimmy A. Rodriguez
Jimmy A. Rodriguez
Assistant United States Attorney